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November 1, 2021

**Via ECF**

Honorable Leda Dunn Wettre. USMJ  
Martin Luther King Building & U.S. Courthouse (MLK 3C)  
50 Walnut Street  
Newark, New jersey 07101

Re: Parks, Nijeer v. McCormack, John, et al  
Civil Action 2:21-cv-04021

Dear Judge Wettre:

Please accept this letter brief as a status report on behalf of Plaintiff ahead of the Conference scheduled before Your Honor this Wednesday, November 3, 2021.

The parties have exchanged Rule 26 Disclosures and have served demands upon each other. All parties report working on responses.

The Middlesex County Prosecutor Defendants have moved for dismissal based on asserted immunities and have obtained a stay of discovery. Plaintiff has opposed this application arguing that the biased conduct of investigatory aspects of the wrongful treatment of plaintiff are outside of the immunities.

Counsel for Woodbridge has moved for dismissal of the claims against the mayor and Sgt. Joseph Licciardi. Plaintiff has opposed these applications as being essentially premature.

Settlement has been broached between the Plaintiff, Woodbridge and Middlesex Corrections, but with no significant progress made in this regard.

DWS/swd

Respectfully submitted,

  
Daniel W. Sexton

cc Lori Dvorak via ECF only  
Frederick L. Rubenstein via ECF only  
Jordyn Jackson, DAG via ECR only  
Client via email only